

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
In Admiralty**

In the Matter of COEYMANS MARINE
TOWING, LLC D/B/A CARVER MARINE
TOWING as Owner and Operator of M/T
Mackenzie Rose, (IMO No. 8968765), *et al.*

Civil Action No. 2:24-cv-00490-MSD-LRL

**NORFOLK AND PORTSMOUTH BELT LINE RAILROAD COMPANY'S
REQUEST FOR INSPECTION OF THE M/T MACKENZIE ROSE TO
COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING**

Claimant/Respondent Norfolk and Portsmouth Belt Line Railroad Company ("Belt Line"), by counsel, pursuant to Fed. R. Civ. P. Rule 34, requests of Petitioner Coeymans Marine Towing, LLC d/b/a Carver Marine Towing, Inc., permission for the Belt Line and its attorneys, experts, surveyors, videographers, and/or photographers from, to inspect, test measure, survey, videotape, and photograph, the M/T MACKENZIE ROSE, its tackle, electronics, engines, equipment appurtenances.

Unless otherwise agreed by counsel, the inspection will be conducted at location in the vicinity of New York Harbor or Charleston Harbor, or such other location as agreed to by the parties, and on date to be agreed upon that is on or before May 16, 2025, commencing at 9:00 a.m. or such other time as agreed to by the parties.

If the requested inspection is not commenced, or not completed on that day, the conduct thereof will be adjourned from day to day, at the same time and place until completed.

Dated: April 30, 2025

NORFOLK AND PORTSMOUTH BELT
LINE RAILROAD COMPANY



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CERTIFICATE OF SERVICE

I certify that on this 30th day of April 2025, I served the foregoing by electronic mail on the following:

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